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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§ Chapter 11
	§
REDDY ICE HOLDINGS, INC., and	§ Case No. 12-32349-SGJ-11
REDDY ICE CORPORATION, ¹	§
	§ Jointly Administered
Debtors.	§

**THIRD MOTION TO CONTINUE HEARING
ON CERTAIN ADJOURNED CLAIM OBJECTIONS**

Reddy Ice Holdings, Inc. and Reddy Ice Corporation, the above-captioned reorganized debtors (together, the “*Reorganized Debtors*”) for their Third Motion to Continue Hearing on Certain Adjourned Claim Objections (the “*Motion*”), respectfully state as follows:

**I.
BACKGROUND**

1. On April 12, 2012 (the “*Petition Date*”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

¹ Reddy Ice Holdings, Inc. is located at 8750 N. Central Expressway, Suite 1800, Dallas, Texas 75231, and its tax identification number is 56-xxx1368. Reddy Ice Corporation is located at 8750 N. Central Expressway, Suite 1800, Dallas, Texas 75231, and its tax identification number is 75-xxx4985.

2. On May 22, 2012, this Court confirmed the *Joint Plan of Reorganization of Reddy Ice Holdings, Inc. and Reddy Ice Corporation* [Docket No. 432] (the “**Plan**”). The Plan became effective on May 31, 2012 (the “**Effective Date**”).

3. Since the Effective Date, the Reorganized Debtors have filed fourteen (14) omnibus objections to claims. At the omnibus claim objection hearing held on June 24, 2013, the following claim objections were adjourned to a future hearing:

- Department of the Treasury – Internal Revenue Service [Claim Nos. 395, 726, 1282, 1310 and 1311] [Third, Eighth, Twelfth, and Fourteenth Omnibus Objections to Claims]
- Yolanda Floyd [Claim Nos. 1244 and 1263] [Thirteenth Omnibus Objection to Claims]
- Martin McNulty [Claim Nos. 1068 and 1069] [Thirteenth Omnibus Objection to Claims]
- Greg Forest [Claim Nos. 459 and 463] [Thirteenth Omnibus Objection to Claims]

(collectively, the “**Objections**”). In addition, on May 31, 2013, claimant Yolanda Floyd filed a “Motion for Abstention and Relief from the Automatic Stay” (the “**Abstention/Lift Stay Motion**”) regarding her claims.

4. A hearing on the Objections and the Abstention/Lift Stay Motion was set and noticed for Tuesday, July 23, 2013 at 9:30 A.M (CST) (the “**Hearing**”).

5. On July 22, 2013, the Court granted the Reorganized Debtors’ Motion to Continue Hearing on Certain Adjourned Claim Objections [Docket No. 735] (the “**First Continuance**”). The Hearing was noticed for August 15, 2013 at 9:30 A.M. (CST).

6. On August 14, 2013, The Court granted the Reorganized Debtors’ Second Motion to Continue Hearing on Certain Adjourned Claim Objections [Docket No. 751] (the “**Second Continuance**”). The Hearing was noticed for August 28, 2013 at 9:30 A.M. (CST).

II.
RELIEF REQUESTED

7. By this Motion, the Reorganized Debtors seek to continue the Hearing on the Objections and the Abstention/Lift Stay Motion. The Reorganized Debtors have continued to work to resolve, and are close to resolving, the Objections and the Abstention/Lift Stay Motion without the need for a contested hearing. The Reorganized Debtors request that the Hearing be continued to Monday, September 9, 2013, at 2:30 P.M. (CST), so that counsel may settle the Objections and Abstention/Lift Stay Motion outside of court.

8. The Reorganized Debtors have contacted the parties holding the above-referenced claims regarding the continuance. All parties have indicated that they do not object to the requested continuance as an effort to resolve the Objections.

III.
NOTICE

9. Notice of this Motion has been served on each holder of a claim subject to this proposed continuance.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter an order, substantially in the form attached hereto, granting (i) the relief requested herein and (ii) such other and further relief as it deems just and proper.

Respectfully submitted this 26th day of August, 2013.

LOOPER REED & MCGRAW P.C.

By: /s/ Jason S. Brookner

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**COUNSEL TO THE
REORGANIZED DEBTORS**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on the 26th day of August, 2013, counsel to the Reorganized Debtors conferred with counsel to each holder of a claim subject to this proposed continuance. All parties have indicated that they do not object to the requested continuance.

/s/ Lydia R. Webb

Lydia R. Webb

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 26th day of August, 2013, she caused a true and correct copy of the foregoing objection to be served by mail, electronic mail, facsimile or overnight delivery to each holder of a claim subject to this proposed continuance.

/s/ Lydia R. Webb

Lydia R. Webb

PROPOSED ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§ Chapter 11
	§
REDDY ICE HOLDINGS, INC., and	§ Case No. 12-32349-SGJ-11
REDDY ICE CORPORATION, ¹	§
	§ Jointly Administered
Debtors.	§

**ORDER GRANTING THIRD MOTION TO CONTINUE HEARING
ON CERTAIN ADJOURNED CLAIM OBJECTIONS**

Upon the motion (the “*Motion*”) of Reddy Ice Holdings, Inc. and Reddy Ice Corporation, the above-captioned reorganized debtors (together, the “*Reorganized Debtors*”), seeking entry of an order (the “*Order*”) continuing the Hearing on the Objections and the Abstention/Lift Stay Motion, all as more fully described in the Motion;² and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and

¹ Reddy Ice Holdings, Inc. is located at 8750 N. Central Expressway, Suite 1800, Dallas, Texas 75231, and its tax identification number is 56-xxx1368. Reddy Ice Corporation is located at 8750 N. Central Expressway, Suite 1800, Dallas, Texas 75231, and its tax identification number is 75-xxx4985.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Objection.

consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B) and (O); and venue being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and there being due and sufficient notice of the Motion; and it appearing that the relief requested in the Motion and granted herein is in the best interests of the Reorganized Debtors, their creditors and other parties in interest; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted to the extent set forth herein.
2. The Hearing is continued to Monday, September 9, 2013 at 2:30 P.M (CST).

End of Order

Prepared by:

LOOPER REED & MCGRAW P.C.

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